

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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MARILYN LUCEY,  
Plaintiff,

v.

HARTFORD LIFE and ACCIDENT  
INSURANCE COMPANY,  
Defendant.

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Civ. No.: 04-CV-10800-NG

**JOINT MOTION TO SEAL THE RECORD FOR JUDICIAL REVIEW**

The parties hereby move the Court pursuant to Rule 5.3 (B) of this Court, to file the Record for Judicial Review under seal and without redaction. In support of this motion, the parties state that the documents contained in the Record for Judicial Review are replete with references to Plaintiff's social security number, date of birth, and financial records. Additionally, the Record for Judicial Review includes hundreds of pages of medical records. Pursuant to Local Rule 5.3, if the Record for Judicial Review is not sealed, the Defendant would be required to redact all social security number, date of birth references, and other personal identifiers. This would be an extremely burdensome task. Furthermore, making the Record for Judicial Review available for public inspection would serve little, if any, public purpose and would intrude upon the Plaintiff's privacy. Additionally, the Court has indicated its preference for maintaining some level of privacy as its Electronic Case Filing Administrative Procedures provide that administrative records in social security cases *and other administrative review proceedings* be filed only on paper and will not be scanned by the Clerk's Office.

In accordance with Local Rule 7.2, the Parties request that the Record for Judicial Review remain impounded from the date of this Court's ORDER, continuing through 60 days following the final judgment of this Court, during which time, counsel for Plaintiff will retrieve

the record from the Office of the Clerk, and retain custody thereof. Counsel for the parties have conferred on this matter, and file this motion jointly.

The Plaintiff

The Defendant

MARILYN LUCEY

HARTFORD LIFE AND  
ACCIDENT INSURANCE COMPANY

By her Attorney

By its Attorneys,

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